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September 16, 2021

**VIA ECF**

Hon. Louis L. Stanton  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *Dresser-Rand Company v. Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A.***  
**S.D.N.Y. Docket No. 1:19-cv-002689-LLS**

Dear Judge Stanton:

We represent Plaintiff Dresser-Rand Company (“Plaintiff”) in the above-referenced action. We write to request permission from the Court to conduct an examination of a non-party witness by videoconference at the upcoming trial set to begin in this matter on September 21, 2021.

Plaintiff intends to call Guido Petruzzelli, an employee of Siemens Capital, as a witness in the trial. Due to a very recent illness, Mr. Petruzzelli does not feel comfortable attending the trial in person in light of the COVID-19 pandemic. Accordingly, Plaintiff seeks the Court’s permission to elicit Mr. Petruzzelli’s testimony by way of videoconference. With the Court’s permission, we can work with the Court’s audio/visual department to make the necessary arrangements. We have conferred with counsel for Defendants Petróleos de Venezuela, S.A. and PDVSA Petróleo, S.A. and they have advised that they do not object to this request.

For these reasons, we respectfully request that the Court allow Dresser-Rand to introduce the live testimony of Mr. Petruzzelli by videoconference at trial.

Respectfully submitted,

/s Nicole Lech

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